REMARKS

New claim 52 includes the subject matter of claims 36-37 and 40 and now refers to one or more of the telephone exchanges being trunk exchanges, and each of the trunk exchanges having a direct link to each of the one or more nodes. This amendment provides each router with a direct connection to each trunk exchange which provides a small number of high bandwidth connections and thus establishes a more efficient and more easily configurable router-based network.

The Examiner has raised an obviousness objection in relation to U.S. Patent No. 6,282,194 to Cheesman in view of U.S. Patent No. 6,370,149 to Gorman. Cheesman relates to ATM technology and the transit trunk subnetwork shown in Fig. 2. Cheesman does not disclose communication via one or more routers using Internet Protocol for the traffic as required by Claim 52 of the present invention. Accordingly, Cheesman relates to a fundamentally different type of technology to the present invention. Furthermore, the Examiner's reference to "interface 40 serving IP gateway on Fig. 2" is known prior art as stated by Cheesman in col. 4, lines 37-61 in relation to Fig. 1. This IP gateway does not equate to the routers using Internet Protocol of the present invention. If the Examiner's statement were correct, then the access tandem 18 of Fig. 2 would also require to operate using an Internet Protocol which is clearly not the case.

Gorman relates generally to methods for interfacing with digital and analogue lines and in particular to Digital Subscriber Lines (DSL) which implement an ATM data transmission protocol between the subscriber and the central office, see col. 4, lines 2-3. This interfacing is described in Fig. 2 which permits a PSTN and a data network to be accessed by users having either copper loop pairs 12 or a digital multiplexed line 18 to their homes. Hence, Gorman is concerned

with interfacing and with access in a telecommunications system and does not relate to the transport of data between routers to which the present invention refers.

It is respectfully submitted that the disclosures of Cheesman and Gorman cannot logically be combined because the former relates to a different technology (ATM) to the present invention, and the latter relates to unrelated aspects (access and interfacing) to the present invention. These differences would be entirely evident to a skilled person in the field of telecommunication systems. The skilled person would not seek to combine the teachings of Gorman and Cheesman because there could be no solution to the problem which is solved by the present invention. If the skilled person had accidentally combined the teachings of Gorman and Cheesman,then the result might be an ATM telecommunications system having an interface for digital and analogue lines wherein the trunk subnetwork of the telecommunications system has improved capacity. This telecommunications system is far from the arrangements of the present invention which relates in particular to each router having a direct connection to each trunk exchange which provides a small number of high bandwidth connections and thus establishes a more efficient and more easily configurable router-based network.

In view of the above differences the Examiner's assertion in paragraph 2 of the Office Action that "said interfacing units are able to perform as router units in the Cheesman system" is incorrect since fundamentally the interfacing units process ATM cells, and not packets, which are processed by routers. Furthermore, the Examiner's statement which recites "with the motivation of providing a switching system for a communication network" is incompatible with the telecommunications system of claim 52 of the present invention, which requires an Internet Protocol

and routers wherein no switching is performed. A skilled person in the field of telecommunications systems would appreciate the fundamental difference between switching and routing.

In view of the above argumentation, the Examiner's observations in relation to Williams, Allen and Socaciu are moot.

Wherefore, a favorable action is earnestly solicited.

Respectfully submitted,

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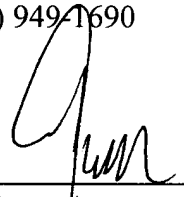

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